

## 2010 SOIL FUMIGANT FEDERAL LABELING CHANGES GUIDANCE

### **Active Ingredients Affected**

This guidance applies to soil fumigant pesticide products that contain the following active ingredients: Methyl Bromide, Metam Potassium/Sodium, Dazomet, Chloropicrin.

See approved labeling at [http://www.cdpr.ca.gov/docs/emon/fumigants/2010\\_labels.htm](http://www.cdpr.ca.gov/docs/emon/fumigants/2010_labels.htm)

### **New Requirements**

#### **Certified applicator supervision:**

Direct applications – the supervising certified applicator must maintain line of sight with all handlers throughout the application.

Water-run applications - the supervising certified applicator must maintain line of sight with all handlers to start the application including set-up, calibration and initiation. The certified applicator must return to the site every two hours to inspect the equipment.

Post applications activities – The supervising certified applicator is responsible for directing the operator of the property and any handlers that perform post application activities including water treatments, tarp perforation, repair and removal. Post application activities and communications must be documented in the FMP.

#### **Entry Restricted Period (ERP)**

These fumigants do not have a restricted entry interval (REI) that allows early entry by field workers. The labeling allows only limited entry and only to trained handlers. All handling activities must be conducted by at least two trained handlers supervised by a certified applicator.

#### **PPE**

Labels have different PPE requirements dependent on handler task.

Respiratory protection required for some tasks and situations. See also Stop work triggers.

All labels require at least one or two appropriate respirators be maintained on-site. All labels require at least one emergency-use SCBA be maintained on-site. This must comply with 3CCR section 6739 emergency-use sign and location requirements.

#### **Good Agricultural Practices (GAP)**

Labels require (not recommend) GAPs. GAPs address weather conditions, soil temperature and moisture, soil preparation and sealing, methodology, equipment specifications, calibration and maintenance and tarp provisions.

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### **Stop Work Triggers**

Some labels require air-monitoring via direct reading instrument, some labels allow sensory irritation as the trigger. When triggered all work must stop or all handlers must wear appropriate respiratory protection. When wearing respiratory protection air-monitoring is required. If a second trigger is reached, work must stop until air samples show a reduced hazard or, for some labels, a higher level of respiratory protection is employed.

### **Fumigant Management Plan**

All labels require the supervising certified applicator to verify and sign a FMP prior to initiating an application and to provide to inspectors upon request. The FMP should be on-site during the application process when the supervising certified applicator is required to be on-site. The FMP is a comprehensive and detailed plan for each fumigant block. The supervising certified applicator must also complete and sign a post application summary within 30 days of the application providing details of any deviation of the FMP and any complaints or incidents.

### **Training**

In addition to standard training all handlers are required to receive fumigation information from registrants. The registrant must provide this information to the supervising certified applicator. The certified applicator must provide the information to all handlers.

### **Decontamination**

All fumigant rigs must carry 5 gallons of water. In addition at least 5 gallons of water must be available at the service rig. The water containers must be labeled, “Decontamination water not to be used for drinking”.

### **Application method and rate restrictions**

Consult labeling for method restrictions and lowered maximum rates.

### **Permit Guidance**

When issuing a permit for the subject fumigants assure that the permittee is aware of the new labeling requirements and the FMP and Post Application Summary provisions. Inform the permittee of the California and federal templates that may be used to comply with labeling. When the permittee has a FMP at the time of permit application, use it and relevant permit conditions to complete the permit application.

For MITC generating fumigants the FMP, Post Application Summary and attachment templates may be used to provide the documentation of information required by permit conditions.